

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

GORDON SCHIFF, *et. al.*,

*Plaintiffs,*

v.

U.S. OFFICE OF PERSONNEL  
MANAGEMENT, *et. al.*,

*Defendants.*

Case No. 1:25-cv-10595

**PLAINTIFFS' MOTION TO EXCEED 20-PAGE LIMIT**

Plaintiffs respectfully request that they be allowed to file a memorandum of law in support of their Motion for Preliminary Injunctive Relief that exceeds the Local Rule 7.1(b)(4) page limit of 20 pages.

Due to the complexity of the case and the multiple proposed grounds for preliminary relief, Plaintiffs require additional pages to fully brief the issues relevant to their motion. Plaintiffs' counsel conferred with counsel who will be representing the Defendants, and they indicated that Defendants take no position on a motion for an additional 10 pages. Plaintiffs respectfully request leave to file a memorandum of law in support of their Motion for Preliminary Injunctive Relief of up to 30 pages.

Respectfully submitted,

[signature blocks on next page]

Dated: March 24, 2025

By: /s/ Jessie J. Rossman

Jessie J. Rossman (BBO # 670685)  
Rachel E. Davidson (BBO # 707084)  
Zoe R. Kreitenberg (BBO #715356)  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF MASSACHUSETTS, INC.  
One Center Plaza, Suite 801  
Boston, MA 02018  
617-482-3170  
jrossman@aclum.org  
rdavidson@aclum.org  
zkreitenberg@aclum.org

Scarlet Kim (*pro hac vice*)  
Vera Eidelman (*pro hac vice*)  
Tyler Takemoto (*pro hac vice*)  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street, 18th Floor  
New York, NY 10004  
scarletk@aclu.org  
veidelman@aclu.org  
ttakemoto@aclu.org

John Langford (*pro hac vice*)  
David Schulz (*pro hac vice*)  
MEDIA FREEDOM & INFORMATION ACCESS  
CLINIC  
Abrams Institute  
Yale Law School  
P.O. Box 208215  
New Haven, CT 06520-8215  
john.langford@ylsclinics.org  
david.schulz@ylsclinics.org

*Attorneys for Plaintiffs*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

Although counsel for Defendants have not yet formally entered an appearance in this case, I, Jessie J. Rossman, hereby certify that in accordance with Local Rule 7.1(a)(2), I communicated via email and phone on March 20, 2025, with the Chief of Defensive Litigation at the United States Attorney's Office for the District of Massachusetts, Rayford Farquhar. Attorney Farquhar indicated that Attorney Shawna Yen has been assigned to be counsel for Defendants in this matter and further indicated that Defendants take no position on this motion.

/s/ Jessie J. Rossman  
Jessie J. Rossman

**CERTIFICATE OF SERVICE**

I hereby certify that on March 24, 2025, a true copy of the foregoing will be electronically filed with the Clerk of Court using the Cm/ECF system, which will then send a notification of such filing (NEF). I further certify that on this same date I will cause an electronic copy to be sent via email to Attorney Shawna Yen.

/s/ Jessie J. Rossman  
Jessie J. Rossman